

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Trudy B. Grant, Sarah Krawcheck,)
Nashonda Hunter, Max Milliken,)
Jordan Mapp, and Caleb Clark,)

Plaintiffs,)

v.)

Howard Knapp as the Executive)
Director of the South Carolina)
Election Commission, Dennis Shedd)
(Chair), JoAnne Day, Clifford J.)
Edler, Linda McCall and Scott)
Moseley, as Members of the South)
Carolina Election Commission, and)
Charleston County Board of)
Elections and Voter Registration,)

Defendants.)

Case No.: 2:23-cv-06838-BHH

Plaintiff Krawcheck's Answers to State Defendants' First Interrogatories

Plaintiff Sarah Krawcheck provides the following answers to Election Defendants' First Set of Interrogatories.

Definitions and Instructions are as specified in the Interrogatories, with the following supplementation:

Plaintiff Krawcheck was only 13 years old in 2008, so answers to Interrogatories 1, 2 and 6 are provided for all dates since plaintiff Krawcheck became 18 years old and thus eligible to vote.

ANSWERS

1. For each of the Plaintiffs, state your full name, any/and all prior names, including aliases or nicknames, dates of birth, Social Security numbers, your current address, and all addresses for

the years 2008 through the present. For each address, document the inclusive months and years you lived at each address and whether you owned or rented each address.

Answer: Sarah Louise Krawcheck, no other names; DOB [REDACTED] 1995; SSN: [REDACTED]; Current address: [REDACTED], Charleston, SC 29403 since May 2024.

Prior addresses:

Chapel Hill, NC from August 2014 - May 2018;
[REDACTED] New York, NY 10075 (from July 2018);
[REDACTED] New York, NY 10075 (from July 2019);
[REDACTED] Mount Pleasant, SC 29464 (from November 2020); and
[REDACTED]; Mount Pleasant, SC 29464 (from June 2022).

2. For each of the Plaintiffs, describe the date and the precinct, county, and state in which you are or have been registered to vote for the years 2008 through the present. Document the inclusive months and years you were registered to vote in each precinct, county, and state.

Answer: Plaintiff Krawcheck does not recall the precinct she voted in while in North Carolina. In 2023, Plaintiff Krawcheck registered in Mt. Pleasant Precinct 11, Charleston County, SC. Recently I moved, as shown above, and will be in a new precinct.

3. For each of the Plaintiffs, describe every election in which you voted by year and type of election, (e.g. primary, general, special).

Answer: Plaintiff Krawcheck has not voted in South Carolina. Plaintiff Krawcheck was previously registered and voted in some elections in Jackson County, North Carolina, in the 2020 presidential election and some midterm or primary elections, but cannot remember which ones.

4. For each of the Plaintiffs, for every election described in response to Interrogatory number 3, indicate:

- a. the method of voting you used; and
- b. whether you requested an absentee ballot application, and if so, the county board of voter registration and elections to which the request was made, the absentee application excuse identified on the request, whether the application was granted or denied, and if denied, the reason for the denial.

- Answer:**
- a. Plaintiff Krawcheck voted in person at her precinct every time in North Carolina except once I voted by mail, but do not recall which election that was.
 - b. Plaintiff Krawcheck requested a mail ballot once in North Carolina, but does not recall which election it was. She received said mail ballot without difficulty.

5. For each of the Plaintiffs, describe all election(s) in which you were unable to cast a ballot because you could not vote absentee by mail and the reason you were unable to cast a ballot on election day in this election.

Answer: None.

6. For each of the Plaintiffs, describe your employment status for the years 2008 through the present. For each employer or school listed, document the inclusive months and years you were employed or in school, the address of the employer or school, and the date of graduation if applicable.

Answer: UNC Chapel Hill, (Chapel Hill, NC) August 2014 - May 2018 (graduated);
Daymaker Giving, (New York, NY) September 2017 - August 2020;
Glossier, (New York, NY) August 2018 - March 2019;
Iris Nova, (New York, NY) March 2019 - November 2019;
Sorelle (Charleston, SC) July 2023 - January 2024; and
Butterfly Tutoring (Mount Pleasant, SC) January 2020 – Present.

7. For each of the Plaintiffs, state whether you contend that you currently qualify or have ever qualified to vote absentee under S.C. Code Ann. §§ 7-15-110, 7-15-320, 7-15-600, *et. seq.*, or any other current or former provision of Title 7 of the S.C. Code Ann., and describe the qualification.

Answer: No.

Under penalty of perjury, I declare that the foregoing answers are true and correct.

Sarah Krawcheck

7/11/24

Sarah Krawcheck

Date

Date: July ___, 2024

s/Armand Derfner

Derfner & Altman, LLC
Armand Derfner, Fed. ID No. 528
Jonathan S. Altman, Fed. ID No. 5796
575 King Street, Suite B
Charleston, SC 29403
aderfner@derfneraltman.com
jaltman@derfneraltman.com
Telephone: (843) 723-9804

Susan K. Dunn, Fed. ID No. 647
37 Charlotte Street, Suite A
Charleston, SC 29403
susandunn1950@gmail.com
Telephone: (843) 830-1571

Chad W. Dunn, Esq. (*Pro Hac Vice*)
Brazil & Dunn, LLP
1900 Pearl Street
Austin, TX 78705
chad@brazilanddunn.com
Telephone: (512) 717-9822

Attorneys for Plaintiffs